

**ENVIRONMENTAL HEALTH COALITION OF WESTERN MASSACHUSETTS**

**P. O. Box 614  
Leverett, MA 01054  
(413) 253-2646**

**8502 '99 JUN -1 A11 :06**

May 25, 1999

Dockets Management Branch  
The Food and Drug Administration  
Department of Health and Human Services, Rm. 1-23  
12420 Parklawn Dr.  
Rockville, MD 20857

**Re: 99P-1340/CP 1 Petition to Have "Eternity eau de perfume" Misbranded**

Dear Sir or Madam:

As chairperson of the Environmental Health Coalition of Western Massachusetts, a grassroots organization that helps to serve the needs of chemically sensitive people, I am well aware of the hazards of perfumes. Also, as a RN for more than thirty years, I have learned the hard way the serious cognitive effects of perfumes. The use of scented products blocks my right of access to an environment.

I am aware that earlier this month, the Environmental Health Network (EHN) submitted the above petition to have Calvin Klein's "Eternity eau de perfume" declared misbranded. I am writing because I fully support this petition and request that the FDA give it careful attention with regard to your regulations 21CFR Sec. 740.1, 21CFR Sec. 740.2, and 21CFR Sec. 740.10. Regulation 21CFR Sec. 740.10 specifically states:

"Each ingredient used in a cosmetic product and each finished cosmetic product shall be adequately substantiated for safety prior to marketing. Any such ingredient or product whose safety is not adequately substantiated prior to marketing is misbranded unless it contains the following conspicuous statement on the principal display panel: "Warning--The safety of this product has not been determined."

As the petition shows, "Eternity" contains toxic ingredients and ingredients whose safety have not been substantiated. There is no warning label on its packaging.

We all have a right to know the status of safety testing of the

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ingredients in products such as "Eternity" so that we can protect ourselves and our families from toxic chemicals that may cause health problems. Most people are not aware that most fragrance materials have only limited safety testing. They wrongfully assume these products are safe to use in any setting and are surprised when people complain.

Like tobacco smoke, the harmful chemicals currently used in these products may effect the health of many people, including: people with asthma, chemical sensitivities, chronic fatigue, and other environmental illnesses. Children are particularly vulnerable to toxic chemicals found in products purchased and used by their parents, care givers and teachers.

Please act on behalf of the millions of people who have suffered physical illness and injury resulting from fragrance exposure at work, at school and in social settings. These toxic chemicals act as powerful barriers to people disabled by asthma and chemical sensitivities. Because of this, toxic chemicals in fragrances have already ruined countless lives. I thank you advance for taking action on this critically important health issue.

Sincerely,

A handwritten signature in cursive script, appearing to read "Peggy Wolff".

Peggy Wolff MS, RNCS  
Chairperson, EHCWM

## Ask Yourself These Questions:

Are you struggling with symptoms that no one seems to understand?

Have you been through tests and not gotten enough answers?

Are you being heard by those you go to for help?

**Y**ou are not alone. Many people are not feeling well and don't know why. They have asked themselves, "What's wrong with me?" Another key question needs to be asked: "What's wrong with my environment?" Only by asking **both** questions can you identify the problem and find a solution.

*Allergies, Chronic Fatigue Syndrome or Environmental Illness* may be the problem.

Common symptoms are:

- ☐ food craving
- ☐ headaches
- ☐ poor concentration
- ☐ exhaustion
- ☐ intestinal distress
- ☐ mood swings
- ☐ nasal congestion
- ☐ muscle weakness
- ☐ aches and pains
- ☐ irritability

Symptoms are the way your body tells you something is not right. Begin to listen.

## Purpose

- **Counsel** individuals, families and groups about environmental health issues.
- **Educate** lay people and health care professionals about environmental health issues.
- **Advocate** for environmentally safe housing, schools and workplaces.

**Peggy Louise Illig Wolff, M.S., R.N.C.S., C.H.N.** is a Clinical Nurse Specialist in Psychiatric-Mental Health Nursing and was one of the first Certified Holistic Nurses in the country. She holds a Master's degree in Mental Health Nursing and is licensed by the Commonwealth of Massachusetts as a Registered Nurse. She has been a therapist in private practice for over ten years, using psychotherapy, relaxation and imagery, and holistic nursing. Her practice is expanding to include environmental health counseling. Through personal experience with environmental health challenges, Peggy has gained the kind of knowledge needed to assist those similarly affected.

## Non-Toxic Office

The HEALTHY PEOPLE • HEALTHY PLACES office is designed to minimize dust, mold and chemical contaminants. Purified air, hard wood floors, unscented cleaning products, and electric heat create a nontoxic environment.

For additional information, or to schedule an appointment, call 413-253-2646 or write to

HEALTHY PEOPLE • HEALTHY PLACES  
24 South Prospect Street  
Amherst, MA 01002

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## Environmental Health Counseling

- ☐ *Allergies*
- ☐ *Chronic Fatigue Syndrome*
- ☐ *Environmental Illness*
- ☐ *Multiple Chemical Sensitivity*

## What's Going On?

*Allergies, Chronic Fatigue, and Environmental Illness* are fast becoming common health problems.

Why have so many people developed these problems? Because repeated exposure to toxins inside and outside our homes, schools, and workplaces leave us vulnerable.

Toxins can come from many sources, such as:

- ☐ pollens from grasses, trees and weeds
- ☐ molds
- ☐ pesticides
- ☐ chemicals in personal care products, clothing, cleaning products, upholstery, building materials and wood smoke
- ☐ electromagnetic field disturbances from appliances, telephones, fluorescent lighting, and computers

HEALTHY PEOPLE • HEALTHY PLACES helps you take a wholistic view of yourself and your environment. We suggest clear, specific approaches to help you feel better. Aren't you ready to fully enjoy life NOW?

## HEALTHY PEOPLE • HEALTHY PLACES Services

### Individual Sessions

A tailor-made program is the most beneficial for you. A short-term program (1-3 sessions) can give you tools to use immediately. A long-term program (more than 3 sessions) provides an opportunity to explore options for those individuals with long-standing health challenges. Wholistic approaches, including: environmental strategies, energy balancing, nutrition, detoxification, counseling, movement, and relaxation and imagery are offered.

### Family Sessions

When a family member has *Allergies, Chronic Fatigue Syndrome or Environmental Illness*, all family members are affected. HEALTHY PEOPLE • HEALTHY PLACES offers family counseling that respects each family member by providing a safe, structured way to explore environmentally-related family health issues.

### Group Sessions

Small groups offer participants an opportunity to talk about the many challenges of *Allergies, Chronic Fatigue* and *Environmental Illness*. A supportive environment in a nontoxic office encourages people to take a pro-active role in caring for themselves.

### Telephone Consultations

Recognizing that some people may be unable to leave their homes to come to the office, telephone sessions provide a way to get needed information and support.

### Resource and Referral

Save time, energy and money by knowing which local, regional and national resources can best help you. HEALTHY PEOPLE • HEALTHY PLACES can refer you to people (clinical ecologists, nontoxic builders, nutritionists, massage therapists, chiropractors, and others) experienced in helping those with *Environmental Illness, Chronic Fatigue Syndrome* and *Allergies*.

chemical exposures. Of course, people who profit from the manufacture and sale of chemicals would like all of us to assume that "ordinary" chemicals are safe and that commercially available products are tested and regulated. But it's not so. Similarly, chemical profiteers would like us to believe that EI people are just a bunch of attention-seekers, neurotics, or genetically flawed weaklings who can't handle "normal" chemicals. But it's not so. Athletes, children, business people, scientists, farm and factory workers, teachers—anyone can become EI. No one is immune.

### How It May Be About You, After All

Like everyone else in this country, you're continually exposed to a barrage of chemicals. So why increase the chance of becoming EI by putting toxic chemicals on yourself? When you wear scented products, you breathe in those chemicals all day long, and they're also absorbed through your skin. Just because you can't smell the product after a while doesn't mean that it's worn off. It's just that your nose is worn out and has shut down in self-protection. But that doesn't keep the chemicals from continuing to enter your body through your lungs and skin.

In fact, becoming insensitive to the smell of scented products is a common warning sign that EI is developing. Unfortunately, scented-product-users generally aren't aware that they are losing their sense of smell until they start using so much of the products that other people begin making comments or moving away from them. If you want to learn more about the manifestations of EI so that you can better protect your health, see the book by Randolph and Moss that's listed at the end of this brochure.

If it still seems incredible that toxic chemicals are in the scented products you use—or that even trace amounts of those chemicals can harm the people around you—remember that manufacturers

aren't in the business of giving people the whole story. Even ten years ago the idea that second-hand cigarette smoke could be harmful was just beginning to reach the public. And it's taken even longer for the public to learn that many other things besides tobacco are put into cigarettes. But what we don't know can hurt us. Choose to know. Be aware, for your own protection and the protection of those around you.

### For More Information:

Dadd, Debra Lynn. *Nontoxic, Natural, and Earthwise: How to Protect Yourself and Your Family from Harmful Products and Live in Harmony with the Earth*. New York: Putnam, 1990.

Lawson, Lynn. *Staying Well in a Toxic World: Understanding Environmental Illness, Multiple Chemical Sensitivities, Chemical Injuries, and Sick Building Syndrome*. Chicago: Noble Press, 1993.

Randolph, Theron G., and Ralph W. Moss. *An Alternative Approach to Allergies: The New Field of Clinical Ecology Unravels the Environmental Causes of Mental and Physical Ills*, revised ed. New York: Harper and Row, 1989.

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## Fragrance-Free Encounters and No-Fragrance Spaces— *Not just a personal preference, but a Vital Matter of Health*

You may have been given this brochure by a friend, co-worker, relative, or professional who is trying to explain the need to avoid exposure to scented products. If so, this person probably is environmentally ill (EI) or is trying to protect the health of others who are EI. Someone who is EI (for instance, as a result of chemical injuries caused by pesticides or solvents) can be harmed by exposure to common chemicals, including the chemicals found in aftershave, perfume, scented hair products, and scented cosmetics, lotions, powders, and soaps. A person who is EI not only needs to avoid personal use of scented products but also needs to avoid other people who use such products and places that have picked up their smells

As you probably can imagine, this is difficult—both because "smelly stuff" seems to be everywhere these days and because any one person's life intersects with the lives of many others. An EI person has to deal with this difficult task everyday, but to you the whole concept may be new and strange.

This brochure is written with *your* situation in mind. It's understandable that you may feel puzzled, annoyed, hurt, intimidated, or even vaguely insulted by a request to leave off the scented stuff when you're going to be around a certain person or going to be in a certain space. How are you supposed to understand this request when you've never had it explained to you before? Here's your chance to understand—and to protect your own health at the same time.

As in many other situations, the best way to understand is to not misunderstand. And most misunderstandings about this subject arise from two common assumptions: 1. that the no-fragrance request is somehow about you as a person, and 2. that the request is about smells as such. But in fact it's all about chemicals.

## It's Not the Smell, It's the Chemical

The problem with scented products is not so much the smell itself as the chemicals that produce the smell. Nearly all scented products currently on the market are made largely or entirely of synthetic chemicals, usually derived from petroleum or coal tar. Nearly one-third of the chemical additives used in perfumes and other scented products are *known* to be toxic. And it's not safe to assume that the other chemicals are safe just because they aren't yet known to be toxic. (Keep in mind that most of the chemicals used in this country, including 90% of the pesticides, have *never* been tested.) And just one perfume can contain more than 500 chemicals. Expensive products are just as likely as cheap ones to contain synthetic chemicals. And words like "hypoallergenic," "natural scent," "floral," and the names of various flowers don't mean that you can trust the product under the label—they just mean that the manufacturer wants you to *think* that the product is safe. Even "unscented" may actually mean that a masking fragrance has been added to the product to disguise the smell of certain ingredients.

The only safe assumption about scented products is that they contain numerous toxic chemicals which constantly vaporize into the air and attach themselves to the hair, clothing, and surroundings of anyone who wears them. These chemicals are skin irritants, suffocants, eye and respiratory tract irritants, and neurotoxins. That's

why being around someone who's wearing a scented product (or who's wearing clothes that have picked up smells from past use of scented products) can cause an EI person to develop obvious allergy symptoms, (sneezing, coughing, watery eyes), to have an asthma attack, to develop a headache, to become dizzy or nauseous, to have trouble focusing or thinking or remembering, to experience sudden mood changes, to develop muscle cramps or spinal subluxations, or even to have a seizure or lose consciousness.

And that's why wearing scented products isn't just a personal choice. It's a choice to impact the air space of others—and in ways you may not be able to predict or control. And that's why "I'm just wearing a *little!*" or "It's not *perfume*, it's just my soap" are irrelevant responses. The chemicals don't care. They don't care how much you're wearing or in what form you're wearing it—they're going to vaporize into the air around you and do their chemical thing, even if *you* weren't planning to harm someone.

## It's Not About You

Knowing that the problem with scented products is the chemicals they contain may help you understand that a request to avoid such products is not a statement about you. An EI person is not trying to insult your taste. Don't assume that the EI person is saying "You stink" or "You make me sick." Nor is an EI person overlooking the fact that you probably used a scented product from habit, in an attempt to dress up, or because smelling good is highly prized in your culture. No one's trying to put you or your culture down—just trying to give you some little-known but vital facts. Smelling good may be a personal or cultural value—but being toxic isn't.

Don't be taken in by the fragrance industry's ad campaigns. They'd like you to believe that

using their products is a way to "express yourself." But all you're expressing is their incredible profit margin: Products that cost manufacturers only pennies to make are sold for bundles of money.

You don't need to use poison to get clean or smell good. For information on truly safe products, see the book by Dadd that's listed at the end of this brochure. And if you're worried you'll forget to leave off the smelly stuff on a day when you'll be around an EI person or be in a no-fragrance space, just tape a "No Fragrances Today" note to your mirror where you'll see it in the morning as you get ready for the day.

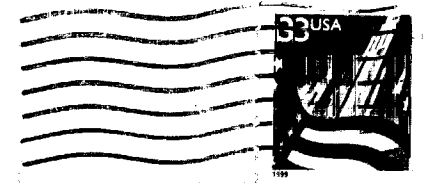
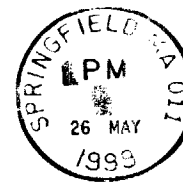
## Yes, It's for Real—and It's Widespread

If you've never heard of EI before, or if you've heard of it only through some sneering, uninformed mention on television, you may be wondering if EI is for real. Perhaps you're worried that someone is putting you on, or you wonder if the EI person's problem may be "all in the head," or maybe you assume that EI is a rare condition.

Actually, EI is widespread—and rapidly increasing. Twenty to thirty percent of the U.S. population has physical reactions to one or more types of synthetic substances. Unfortunately, EI people may go undiagnosed, or their problem may be improperly diagnosed as psychological in origin, because these reactions to chemicals often are delayed and aren't something that physicians are taught to recognize. Since an EI person may look healthy, just as someone with diabetes or multiple sclerosis may look healthy, others often are reluctant to believe that the disability is real.

Anyone can become EI, because anyone's natural detoxification mechanisms can break down as the result of chemical overload—and such an overload can result from repeated, "low-level"

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